

**FORM TO BE USED BY PLAINTIFFS IN FILING A COMPLAINT
UNDER THE EQUAL EMPLOYMENT OPPORTUNITY ACT, 42 U.S.C. Chapter 21,
Subchapter VI**

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
_____ DIVISION

Anita L. Bourne,)

Plaintiff,)

v. Texas Roadhouse Spotsylvania Location)
Cheryl Lynn, Alicia Nicole)
Karl Sanders (Management Team))
AB)

Defendant(s).)

(Enter the full name(s) of ALL parties in this lawsuit.)

Please attach additional sheets if necessary).)

Civil Action No.: 3:24cv218
(To be assigned by Clerk of District Court)

Jury Trial: Yes No
(circle one)

COMPLAINT

1. State the full name of the Plaintiff, address and telephone number.

Name: Anita L Bourne

Address: 1117 Kings Hwy 25, King George VA 22485

Telephone Number: 540-310-8405

2. List all Defendants. State the full name of the Defendant, even if that Defendant is a government agency, an organization, a corporation, or an individual. Include the address where each Defendant may be served. Make sure that the Defendant(s) listed below are identical to those contained in the above caption of the complaint.

- a. Defendant No. 1

Name: Texas Roadhouse Spotsylvania Location

Address: 3940 Plank Rd Fburg VA 22407

b. Defendant No. 2

Name:

~~Cheerl Tyrae, Alicia Nicole and Karl Saunders~~ ^{AB}

Address:

~~Management Team at Texas Roadhouse Spokylu,~~
3940 Plank Rd, VA 22407

NOTE: IF THERE ARE ADDITIONAL DEFENDANTS, PLEASE PROVIDE THEIR NAMES AND ADDRESSES ON A SEPARATE SHEET OF PAPER.

Check here if additional sheets of paper are attached: ☐

Please label the attached sheets of paper to correspond to the appropriate numbered paragraph above (e.g. Additional Defendants 2.c., 2.d., etc.).

3. On what day were you discharged from employment or otherwise affected by the alleged unlawful employment practice(s) of the defendant(s) above?

July 23, 2023

4. On what day was your complaint filed with the Equal Employment Opportunities Commission?

October 25, 2023

5. What action did the Commission or its representatives take in regard to your complaint?

They did not proceed further, nor a determination about whether further investigation was necessary doesn't mean there is no merit, nor certified that they were in compliance with the statutes.

6. If no action was taken or if your complaint was dismissed by the Commission, did you receive notice from the Commission within 180 days of the date listed in 4. above, of your right to bring a civil action to correct the alleged unlawful employment practice(s)?

Yes, I received the response on 12/28/2023

7. If the answer to 6. is yes, has 90 days passed since your receipt of the notice described in 6.?

No it would be March 28 2024

8. Has any action been brought in any state court or in any other federal court concerning the alleged unlawful employment practice(s) of the above defendant(s)?

Not to my knowledge and not by me

If your answer to 8. is yes, describe the action in the spaces below.

a. Parties to the action:

b. Court (if federal court, give district; if state court, name the city or county):

c. Docket Number: _____

d. Judge's Name: _____

e. Is the case still pending: _____ If not, what was the ruling? _____

Was the case appealed? _____

If more than one action has been filed, please provide this information on a separate sheet of paper and label this information as paragraph 8.f., etc. Check here if additional sheets of paper are attached: ☐

9. Are there any state or local agencies presently making active efforts to obtain a voluntary end to the alleged unlawful employment practice?

☐ Yes

☐ No

☐ I DON'T KNOW

If yes, please describe which agencies are involved and whether their efforts are being undertaken on your behalf?

On the remainder of this form, please answer the questions relating to your problems with the defendant(s) and, if necessary, include additional sheets of paper in order to fully explain the facts beyond your complaint.

A. What was or is your employer?

Texas Roadhouse Restaurant
Spokane City location

- B. What individuals were involved in your discharge or other unlawful practice about which you are complaining? (Also explain what position each individual held, what that individual did that affected you, and about which you are complaining?)

Cheepat Tyree, Aliecia Nicole and Karl Saunders. They were and are all part of the management team that I filed grievances with the corporate office and then began to receive negative retaliation on the job from the management team.

- C. If you were fired, what reasons were given for your discharge?

The floor manager, Karl Saunders stated the reason for my discharge was that the other managers should not have to walk on eggshells when I am on shift.

If you disagree with those reasons, what do you think were the real reasons?

I believe it is because I turned into the corporate office about the treatment & discrimination I was receiving, the act of hours I was receiving as well.

- D. Does your employer have a grievance procedure to use when employees are unhappy about actions taken against them? yes

- E. If so, did you file a grievance with your employer?

I filed a grievance about the behaviors that I believed was confidential.

If you did, what action was taken?

No action was done but to inform the managers about the grievance and then the retaliation became worse.

F. In the space below (and on additional sheets of paper, if necessary), please state any other facts which you consider important in this complaint.

I believe that I was discriminated against
based on the Civil Rights Act of 1964 Title VII
as well as my white race

G. If you were fired, have you been working since that time? No

If yes, for whom have you worked? _____

What did you do? _____

If you did not get another job, have you received unemployment compensation? yes

If yes, for how long?

I received for 6 months

H. What relief do you want from this court? For example:

Do you want your job back?

No I do not want my job back

Have you suffered any damages?

Stress, health and financial

If so, how much?

My health has declined due to the stress causing pain, migraines and stomach issues.

OTHER:

Financially I have not been able to provide the way I was with my income from my position at Texas Roadhouse

Attach additional sheets of paper as necessary and label this information as paragraph I., etc. Check here if additional sheets of paper are attached. ☐

Signature of Plaintiff



VERIFICATION

State of

Virginia

County of

King George

I declare under penalty of perjury that the foregoing is true and correct.

Executed on this 26 day of March, 2024.

Signature of Plaintiff

